

MINTZ & GOLD LLP  
600 Third Avenue, 25th Floor  
New York, New York 10016  
Telephone: (212) 696-4848  
Facsimile: (212) 696-1231  
Andrew R. Gottesman, Esq.

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

-----X  
In re

DUNBAR PARTNERS BSD LLC

Debtor.

Chapter 11

Case No. 23-40575 (NHL)

-----X

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF ALL PAPERS**

**PLEASE TAKE NOTICE** that, an appearance is hereby entered and request is hereby made by Mintz & Gold, LLP as counsel for Dunbar Owner LLC (the “Client”) creditor and party in interest in the above case, as provided in 11 U.S.C. §1109(b) and the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) 2002, 9007, and 9010(b) that all notices given or required to be given in the above captioned case, and all papers served or required to be served, be given to and served upon:

MINTZ & GOLD LLP  
Attn: Andrew R. Gottesman, Esq.  
600 Third Avenue, 25th Floor  
New York, New York 10016  
Telephone: (212) 696-4848  
Facsimile: (212) 696-1231  
Andrew R. Gottesman, Esq.  
E-mail: [gottesman@mintzandgold.com](mailto:gottesman@mintzandgold.com)

**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Code and Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, statement of affairs, operating reports, schedule of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or

seeks to affect in any way any rights or interest of any creditor or party-in-interest in this case, with respect to (a) the Debtor (b) property of the Debtor's estate, or proceeds thereof, in which the Debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody or control of others that any of the Debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by any of the Notice Parties.

**PLEASE TAKE FURTHER NOTICE** that the Client intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (1) the right of the Client to have final orders in non-core matters entered only after de novo review by a United States District Judge; (2) the right of the Client to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) the right of the Client to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Client is or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, or recoupments the Clients expressly hereby expressly reserves.

Dated: February 27, 2023  
New York, New York

MINTZ & GOLD LLP

by: /s/ Andrew R. Gottesman  
Andrew R. Gottesman

600 Third Avenue, 25th Floor  
New York, New York 10016  
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Facsimile: (212) 696-1231  
Andrew R. Gottesman, Esq.  
E-mail: [gottesman@mintzandgold.com](mailto:gottesman@mintzandgold.com)

*Attorneys for Dunbar Owner LLC*